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PRC

**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**GRAPHIC PACKAGING CORPORATION
(FORMERLY COLORPAC, INC.)
FRANKLIN, OHIO
OHD 058 394 313**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EPA Region	:	5
Site No.	:	OHD 058 394 313
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Graphic Packaging Corporation (GPC) facility in Franklin, Warren County, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The GPC facility manufactures bags, pouches, and overwrap for products including moist pet foods, cookies, microwave popcorn, bar and soap dishes, and tobacco. The facility operates as a generator of hazardous waste with less than 90-day storage. GPC generates off-specification printing ink (D001, F003, F005) from ink that has gelled in storage, waste solvent (D001, F003, F005) from printing press roller cleaning, solvent still bottoms (D001, F003, F005) and still bottom ink sludge (D001, F003, F005) from solvent recovery, nonhazardous wastewater, and nonhazardous waste cleaning solution from the cleaning of printing press bearings and other machine parts.

The 90,000-square-foot facility is located on 20 acres of land in a mixed industrial, rural, and residential area of Franklin, Ohio. The facility was built in 1962 by the Flexographic Corporation (Flexographic). Flexographic changed the company name to Colorpac, Inc. (Colorpac) in 1965. Although ownership of the facility changed several times between 1969 and 1972, the facility's name remained unchanged. The facility was owned by Monarch Marking from 1969 to 1970, Monarch Marking and Pitney Bowes from 1970 to 1972, and American Controlled Industries from 1972 to 1985.

The Graphic Packaging Corporation (GPC) purchased the facility in 1985, and the facility name changed to reflect the new ownership. GPC owned the facility jointly with the Adolph Coors Company from 1988 until 1992 when the facility was purchased by ACX Technologies, Inc. Operations at the facility have remained basically the same since 1962.

Colorpac's Part A permit application listed the facility as a treatment, storage, or disposal (TSD) facility with storage of hazardous waste in the Hazardous Waste Storage Area (SWMU 4). However, Colorpac was also using the Former Waste Solvent Tank (SWMU 5) to store waste, but possibly for less than 90 days. In 1982, Colorpac requested a change in status from a TSD facility to that of a generator with less than 90-day storage. Colorpac was subject to closure

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requirements because hazardous waste had previously been stored at the facility for longer than 90 days in SWMU 4.

Colorpac submitted a Request for Change in Status form to EPA in January 1985, which stated that all waste stored at the facility for greater than 90 days had been permanently removed. In March 1985, EPA acknowledged Colorpac's change in status to a RCRA generator of hazardous waste with less than 90-day storage.

The PA/VSI identified the following five SWMUs at the facility. No AOCs were identified.

Solid Waste Management Units

1. Outdoor Solvent Recovery System
2. Indoor Solvent Recovery System
3. Waste Solvent Storage Tank
4. Hazardous Waste Storage Area
5. Former Waste Solvent Tank

The potential for release to ground water, surface water, air, and on-site soils from all SWMUs is low. SWMU 1 is constructed of steel and is located on sealed concrete. SWMU 2 is located indoors on sealed concrete. SWMUs 3 and 4 are located on sealed concrete and are surrounded by concrete berms.

Area ground water is used as a local drinking water source. The City of Franklin draws drinking water from four wells located about 0.4 miles south and downgradient of the GPC facility near the Great Miami River.

A small, man-made cooling pond on the facility property receives noncontact cooling water from the facility. The Great Miami River is located about 0.5 miles south of the facility. The river flows south and eventually enters the Ohio River near Cincinnati. The Great Miami River is used for recreational fishing and boating. GPC does not possess a National Pollution Discharge Elimination System permit because the facility does not discharge to any surface water body. The facility is surrounded by a chain-link fence and is equipped with a fire alarm system.

The GPC facility possess 32 air permits covering the solvent recovery system and ink mixing processes.

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The facility has a permit to discharge wastewater to the City of Franklin sewer system. The wastewater is generated from the solvent recovery process and contains trace amounts of alcohol. GPC is required to test the wastewater for metals and pH before discharging.

PRC recommends no further action for the facility.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Graphic Packaging Corporation (GPC) facility (EPA Identification No. OHD 058 394 313) in Franklin, Warren County, Ohio. The PA was completed on December 8, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on December 10, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified four SWMUs and no AOCs at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history, environmental setting; and receptors.

2.1 FACILITY LOCATION

The GPC facility is located on South Avenue in Franklin, Ohio (latitude 39°33'50"N, longitude 84°18'55"W), as shown in Figure 1. The facility is bordered to the north by residences, to the east by Union Camp Corporation, and to the south and west by farmland.

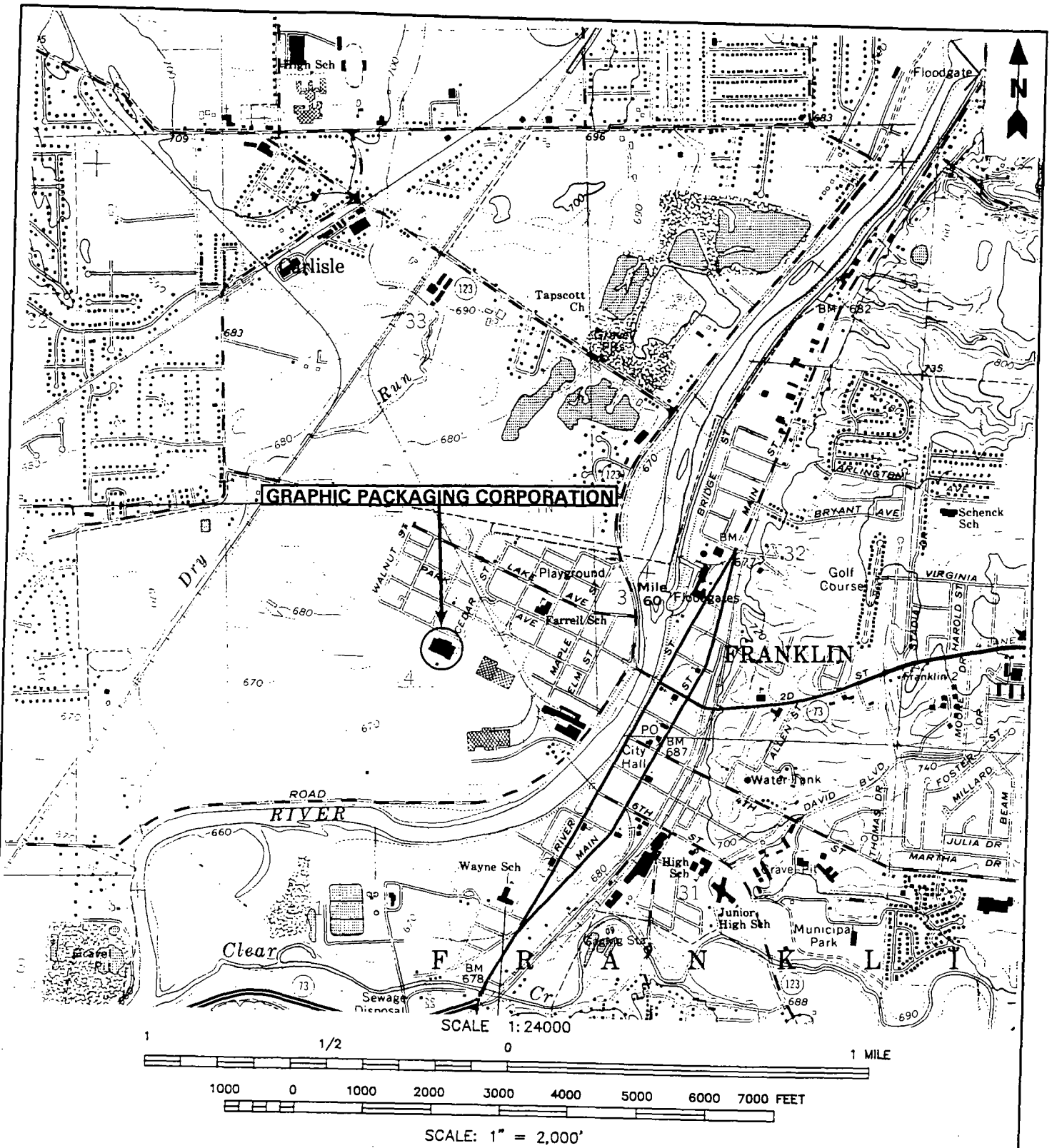
2.2 FACILITY OPERATIONS

The GPC facility building covers 90,000 square feet on 20 acres of land in a mixed industrial, rural, and residential area. The facility was built in 1962 by Flexographic Corporation. In 1965, the facility's name changed to Colorpac, Inc. (Colorpac). Between 1969 and 1972, ownership of the facility changed three times while the name remained unchanged. Monarch Marking purchased the facility from Colorpac in 1969. The facility was later owned by Monarch Marking and Pitney Bowes. American Controlled Industries purchased the facility in 1972.

The Graphic Packaging Corporation (GPC) purchased the facility in 1985, and the facility name changed to reflect the new ownership. GPC owned the facility jointly with the Adolph Coors Company from 1988 until 1992 when the facility was purchased by ACX Technologies, Inc.

GPC manufactures flexible packaging materials and products for manufacturers in the pet food, consumer food, personal care products, and photographic industries. The facility manufactures bags, pouches, and overwrap for products including semi-moist pet foods, microwave popcorn, cookies, bar and dish soaps, and tobacco. Operations at the facility have remained basically the same since 1962.

Raw materials used at the GPC facility are stored in two warehouses located in the northwest section of the facility. Finished products are stored in the manufacturing building. All hazardous waste generated at the facility is stored in the Hazardous Waste Storage Area (SWMU 4) for less than 90 days.



QUADRANGLE LOCATION

GRAPHIC PACKAGING CORPORATION
FRANKLIN, OHIO

FIGURE 1
FACILITY LOCATION

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: Modified from USGS, 1981.

2.3

WASTE GENERATION AND MANAGEMENT

The GPC facility generates off-specification printing ink (D001, F003, and F005), solvent still bottoms (D001, F003, and F005), waste solvents (D001, F003, and F005), still bottom ink sludge (D001, F003, and F005), nonhazardous wastewater, and nonhazardous waste cleaning solution. The facility formerly managed waste solvent (D001, F003, and F005) differently. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Off-specification printing ink (D001, F003, and F005) results from ink that has gelled and is no longer usable. Once ink becomes off-specification, it is transferred from the raw materials warehouses to the Hazardous Waste Storage Area (SWMU 4). GPC generates about 1,832 pounds of off-specification printing ink yearly. The ink is sent to Reclaimed Energy Corporation (Reclaimed Energy) in Connersville, Indiana for fuels blending.

GPC generates solvent still bottoms (D001, F003, and F005) from the Outdoor Solvent Recovery System (SWMU 1). The Outdoor Solvent Recovery System collects solvent laden air from printing presses and laminators, runs the air through charcoal beds which absorb the solvent, and then flushes the solvent out with steam. The dirty solvent is then transferred to a still for reclamation. The still removes waste particles from the dirty solvent, producing solvent still bottoms. The solvent still bottoms are stored in SWMU 4 until shipment to Reclaimed Energy for fuels blending. The recovered solvent is pumped to aboveground storage tanks for reuse. GPC generates about 458 pounds of solvent still bottoms yearly.

Waste solvents (D001, F003, and F005) are generated from the cleaning of printing press rollers. The materials are reclaimed on site at the Indoor Solvent Recovery System (SWMU 2). After cleaning rollers, waste solvent is pumped to the Waste Solvent Storage Tank (SWMU 3). The waste solvent is then transferred to SWMU 2 where it is recovered by distillation. The distillation process generates still bottom ink sludge (D001, F003, and F005). The sludge is stored in 55-gallon drums in SWMU 4 until it is sent for fuels blending at Reclaimed Energy. GPC generates about 192,632 pounds of still bottom ink sludge yearly.

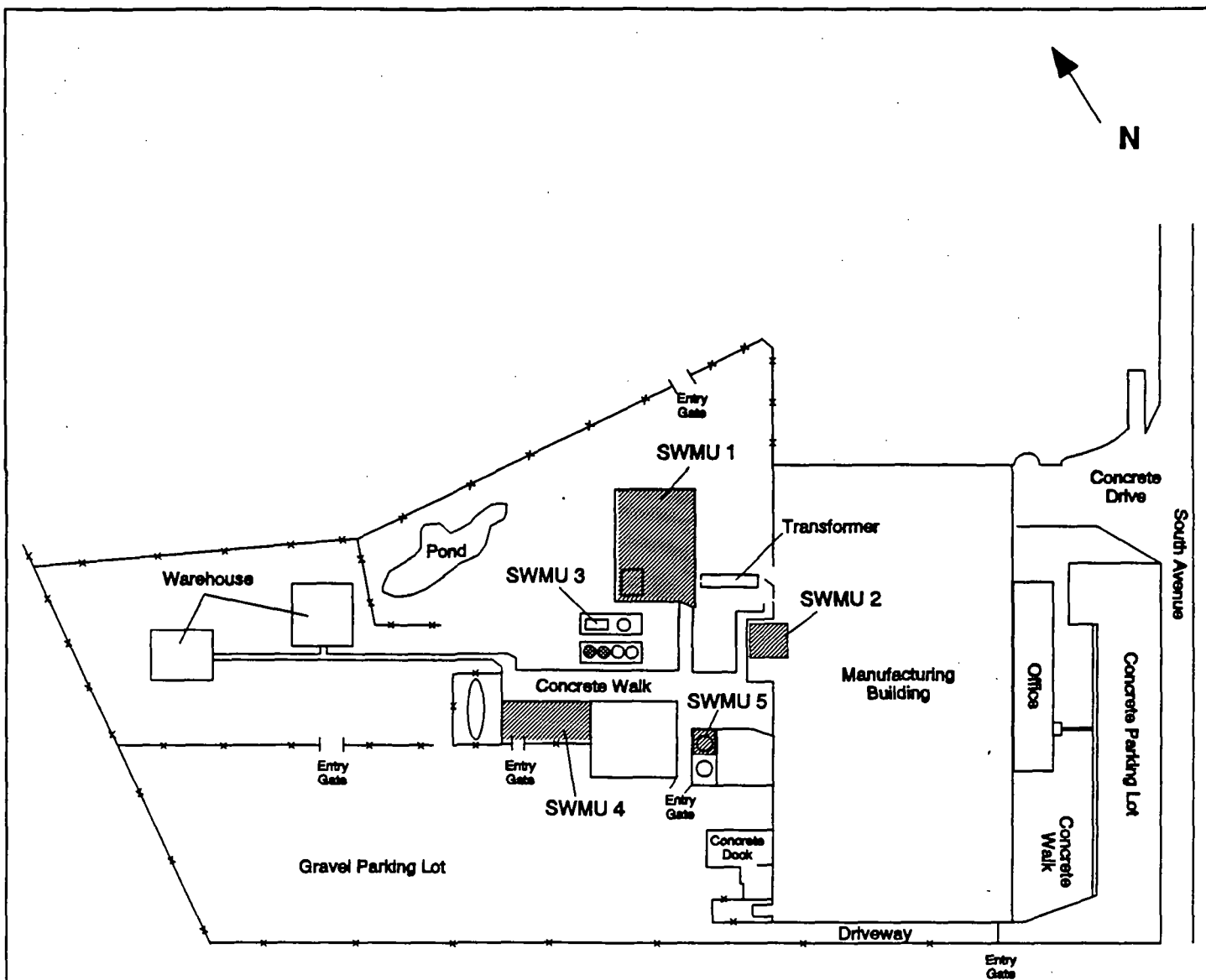
Prior to the installation of the solvent recovery systems, waste solvent (D001, F003, and F005), generated from cleaning operations, was stored in the Former Waste Solvent Tank (SWMU 5) for possibly less than 90 days. The waste solvent was pumped from the tank to a bulk tanker truck and taken to Solvent Resource and Recovery Company in West Carrollton, Ohio for reclamation. In the early 1980s, GPC removed the waste solvent from the tank and had it cleaned. The tank is currently used to store virgin ethyl acetate.

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Outdoor Solvent Recovery System	No	Active
2	Indoor Solvent Recovery System	No	Active
3	Waste Solvent Storage Tank	No	Active
4	Hazardous Waste Storage Area	Yes	Active; RCRA closed in 1985; currently used to store hazardous waste for less than 90 days
5	Former Waste Solvent Tank	No	Inactive as a SWMU; currently used to store virgin ethyl acetate

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units

- SWMU 1 Outdoor Solvent Recovery System
- SWMU 2 Indoor Solvent Recovery System
- SWMU 3 Waste Solvent Storage Tank
- SWMU 4 Hazardous Waste Storage Tank
- SWMU 5 Former Waste Solvent Tank

LEGEND:

—x—x—x— Fence



Recovered Solvent Holding Tanks

0 35' 70'
SCALE: 1" = 70'

GRAPHIC PACKAGING CORPORATION
FRANKLIN, OHIO

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

Source: Modified from Graphic Packaging sketch received by PRC on 12/10/92.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code^a</u>	<u>Source</u>	<u>Solid Waste Management Unit^b</u>
Off-specification printing ink/D001, F003, F005	Gelled ink	4
Solvent still bottoms/D001, F003, F005	Solvent recovery	1 and 4
Waste solvents/D001, F003, F005	Cleaning of printing press rollers	2, 3, and 5
Still bottom ink sludge/D001, F003, F005	Solvent recovery	2 and 4
Wastewater/NA	Solvent recovery	None
Waste cleaning solution/NA	Parts cleaning	4

Notes:

^a Not applicable (NA) designates nonhazardous waste.

^b "None" indicates that the waste stream is not managed on site.

GPC generates about 10,000 gallons per day of wastewater containing trace amounts of alcohol from the solvent recovery process. GPC tests the water for metals and pH before discharging it to the City of Franklin sewer system.

GPC uses a nonflammable, nontoxic, biodegradable solution to clean press bearings and other machine parts. The cleaning solution is reused until it is spent and is then mixed with still bottoms and stored in 55-gallon drums in SWMU 4. The mixture of waste cleaning solution and still bottoms is shipped to Reclaimed Energy for fuels blending.

2.4 HISTORY OF DOCUMENTED RELEASES

No releases from the GPC facility have been documented.

2.5 REGULATORY HISTORY

In late 1980, Colorpac filed a Notification of Hazardous Waste Activity form with EPA (Colorpac, 1980a). A Part A permit application in October 1980 identified Colorpac as a treatment, storage, or disposal (TSD) facility with container storage (S01) of hazardous waste. The application listed ignitable waste (D001) and spent halogenated solvents (F003 and F005). The Hazardous Waste Storage Area (SWMU 4), with a capacity of 15,600 gallons, was listed as the storage unit for these wastes (Colorpac, 1980b). EPA determined the original Part A permit application was lacking a facility map and an overhead photo (USEPA, 1981). Colorpac supplied the missing information, and EPA subsequently granted the facility interim status (USEPA, 1982). It should be noted that GPC was using the Former Waste Solvent Tank (SWMU 5) for waste storage possibly for less than 90 days when the Part A permit application was submitted. The tank was not listed on the application.

In 1982, Colorpac requested a change in status from a TSD facility to that of a generator of hazardous waste with less than 90-day storage (OEPA, 1982). EPA informed Colorpac that because the facility had previously stored hazardous waste for longer than 90 days, Colorpac was subject to closure requirements (USEPA, 1984). Colorpac submitted a Request for Change in Status form to EPA in January 1985, which stated that all waste stored at the facility for greater than 90 days had been permanently removed (Colorpac, 1985). In March 1985, EPA acknowledged Colorpac's change in status to a RCRA generator of hazardous waste with less than 90-day storage (USEPA, 1985). PRC found no documentation indicating that a closure plan was submitted for the change in status.

In 1985, GPC purchased the facility from Colorpac (GPC, 1992). GPC operates as a RCRA generator of hazardous waste with less than 90-day storage.

EPA conducted two hazardous waste generator compliance evaluation inspections at the GPC facility in 1988 and 1989. The first inspection was conducted on August 16, 1988. EPA noted a few minor deficiencies, including improper characterization of hazardous waste on manifests and incomplete employee records (OEPA, 1988). GPC corrected all deficiencies (GPC, 1988).

The second inspection was performed on May 10, 1989. EPA noted deficiencies in GPC's manifests, management of containers, and personnel training records (OEPA, 1989a). GPC corrected all deficiencies (OEPA, 1989b).

GPC possesses 32 air permits covering the solvent recovery systems and ink mixing processes. The facility has no history of odor complaints from area residents.

GPC discharges wastewater generated from the solvent recovery system to the City of Franklin sewer system. The wastewater contains trace amounts of alcohol. The City of Franklin requires the facility to test the wastewater for metals and pH before discharging. GPC is not required to possess a National Pollutant Discharge Elimination System (NPDES) permit because it does not discharge wastewater to any surface water bodies.

No record exists of underground storage tanks (UST) at the facility. No CERCLA activity has been conducted at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Franklin consists of cold, cloudy winters and warm summers. The yearly average temperature is 63.4 degrees Fahrenheit (°F). The lowest average monthly temperature is 37.4°F in January. The highest average monthly temperature is 86.1°F in July. Precipitation for southwest Ohio is well distributed throughout the year. Average yearly rainfall for Warren County is 36.45 inches. Rainfall peaks in July at 4.23 inches and is at its least in October at 1.97 inches (USDA, 1973). The 1-year, 24-hour maximum rainfall is 2.5 inches (USDC, 1961), and

the average yearly net precipitation is 6.0 inches (Todd, 1983). The prevailing wind is from the southwest, and the highest average wind speed is 11 miles per hour in the winter (USDA, 1973).

2.6.2 Flood Plain and Surface Water

A small, man-made cooling pond is located on GPC's property. GPC discharges noncontact cooling water to the pond, which discharges to the local ground water.

The Great Miami River is located about 0.5 mile south of the facility. The river flows south and eventually empties into the Ohio River near Cincinnati. The Great Miami River is used for recreational fishing and boating. No municipal water intakes are located on the Great Miami River downstream from the facility (PRC, 1991).

The GPC facility is located within the 100-year flood plain of the Great Miami River (National Flood Insurance Program, 1987).

2.6.3 Geology and Soils

Warren County lies almost on the crest of the Cincinnati Arch, a large regional anticline running from Tennessee to west-central Ohio. The bedrock in the area of the facility is Ordovician-age shale and limestone of the Cincinnati series and lies at least 150 feet below ground surface. Pleistocene glacial deposits overlie the bedrock and are composed of till, sand, clay, silt, and gravel (Ausich, 1981).

Glacial depositional environments are usually quite unconsolidated, and this is the case in the GPC facility area. The nearest available well log was of a well located about 0.4 mile southwest of the GPC facility. The log listed the following materials in descending order (ODNR, 1992):

- 0 to 12 feet: Clay
- 12 to 28 feet: Gravel
- 28 to 88 feet: Sand and gravel

Soils near the facility belong to the Genessee-Fox association. Typically these soils are well drained and nearly level; they are usually located on flood plains and outwash terraces (USDA, 1973).

2.6.4 Ground Water

Depth to ground water in the area is about 22 feet below ground surface and wells in the area are capable of pumping over 1,000 gallons per minute (Todd, 1983). Ground water in the area is used as a local drinking water source. The City of Franklin supplies area residents with drinking water from four wells located about 0.4 mile to the south and downgradient of the facility near the Great Miami River. The wells are screened at an average depth of about 65 feet. Ground water flow is generally to the south (PRC, 1993).

2.7 RECEPTORS

The GPC facility is located in a mixed industrial, rural, and residential area of Franklin, Ohio. Several residences are located directly across the street from the facility. Farrell Elementary School is located about 0.3 mile northeast of the facility. About 790 private residences lie within 1 mile of GPC. The facility is bordered to the north by residences, to the east by Union Camp Corporation, and to the south and west by farmland. The facility is surrounded by a chain-link fence and is equipped with a fire alarm system.

As mentioned in Section 2.6.2, a small, man-made cooling pond is located on GPC's property. GPC discharges noncontact cooling water to the pond.

The Great Miami River is located about 0.5 mile south of the facility. The river flows south and eventually enters the Ohio River. The Great Miami River is used for recreational fishing and boating. No drinking water intakes are located along the river downstream from the facility.

Area ground water is used for drinking water. The City of Franklin supplies area residents with drinking water from four wells located about 0.4 mile south and downgradient of the facility.

The Great Miami River is a sensitive environment mainly because of its aquatic life. No wetlands exist within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Outdoor Solvent Recovery System

Unit Description:

The Outdoor Solvent Recovery System consists of several tanks containing charcoal beds (see Photograph No. 1), lines which run throughout the facility from printing presses and laminators directly to charcoal bed tanks, and three aboveground storage tanks for storage of the recovered solvent. The charcoal bed tanks and the aboveground storage tanks are located outdoors in the west-central portion of the facility on a sealed concrete pad. The charcoal bed tanks are constructed of steel and measure about 16 feet in diameter and about 40 feet in length. The aboveground storage tanks are made of steel and each has a capacity of 5,000 gallons. GPC checks the structural integrity of the unit daily.

The system collects solvent-laden air from the printing presses and laminators and vents it through the tanks containing the charcoal beds which absorb the solvent. When the beds become saturated, the solvent is flushed out with steam and passed through a condenser. The solvent is then pumped to a still, where it is reclaimed. The clean solvent is then pumped to the aboveground storage tanks where it is stored until it is used again. The solvent still bottoms (D001, F003, F005) generated from the recovery process are collected in 55-gallon drums and stored in the Hazardous Waste Storage Area (SWMU 4).

Date of Startup:

The unit was installed in 1982.

Date of Closure:

The unit is active.

Wastes Managed:	The unit reclaims dirty solvent from printing presses and laminators. This process generates solvent still bottoms (D001, F003, F005).
Release Controls:	The unit is constructed of steel and rests on a sealed concrete base.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release in the area or cracks in the concrete base.
SWMU 2	Indoor Solvent Recovery System
Unit Description:	The Indoor Solvent Recovery System consists of a parts washer and a still. The unit is located indoors in the western portion of the manufacturing building (see Photograph No. 2). Printing press rollers are cleaned in the parts washer with solvent. Once the cleaning process is complete, the dirty solvent is collected from the parts washer and pumped to the Waste Solvent Storage Tank (SWMU 3). It is then transferred to the still for reclamation. The still bottom ink sludge (D001, F003, F005) generated from this process is collected in 55-gallon drums and transferred to the Hazardous Waste Storage Area (SWMU 4).
Date of Startup:	The unit was installed in 1982.
Date of Closure:	The unit is active.
Wastes Managed:	The unit reclaims dirty solvent from the parts washer. This process generates still bottom ink sludge (D001, F003, F005).
Release Controls:	The unit is constructed of steel and is located indoors on sealed concrete.
History of Documented Releases:	No releases from this unit have been documented.

Observations: During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release in the area.

SWMU 3 Waste Solvent Storage Tank

Unit Description: The Waste Solvent Storage Tank is located outdoors and aboveground in the central portion of the facility. The unit stores waste solvent (D001, F003, F005) generated from cleaning processes until it is reclaimed by SWMU 2. The tank is constructed of steel, has a sealed concrete base, and is surrounded by a 2-foot-high concrete berm (see Photograph No. 3).

Date of Startup: The unit has been active since 1982.

Date of Closure: The unit is active.

Wastes Managed: The unit stores waste solvent (D001, F003, F005) until it is reclaimed by SWMU 2.

Release Controls: The unit is constructed of steel, has a sealed concrete base, and is surrounded by a 2-foot-high concrete berm.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release.

SWMU 4 Hazardous Waste Storage Area

Unit Description: The Hazardous Waste Storage Area is located outdoors in the west-central section of the facility. The unit stores hazardous waste and nonhazardous waste in closed 55-gallon drums on a concrete pad measuring 30 feet by 50 feet. The unit is surrounded by a 1-foot-high concrete berm and is uncovered (see Photograph No. 4).

Date of Startup: The unit has been active since 1980.

Date of Closure: The unit was considered RCRA-closed in 1985 when EPA acknowledged its change in status. No closure plan was found in EPA files. The unit currently stores hazardous waste for less than 90 days.

Wastes Managed: The unit stores off-specification ink (D001, F003, F005), solvent still bottoms (D001, F003, F005), still bottom ink sludge (D001, F003, F005), and nonhazardous cleaning solution. All wastes are sent to Reclaimed Energy for fuels blending.

Release Controls: The unit is located on sealed concrete and is surrounded by a 1-foot-high concrete berm.

History of Documented Releases: No releases from this unit have been documented.

Observations: During the VSI, the unit appeared to be in sound condition. PRC noted no evidence of release.

SWMU 5 **Former Waste Solvent Tank**

Unit Description: Prior to the early 1980s, the Former Waste Solvent Tank stored waste solvent (D001, F003, F005) from cleaning operations possibly for less than 90 days. The tank now stores virgin ethyl acetate. The 5,000-gallon unit is located outdoors in the west-central section of the facility. It is uncovered and is surrounded by a 3-foot-high concrete berm (see Photograph No. 5).

Date of Startup: The unit was first used in the mid-1970s.

Date of Closure: In the early 1980s, all waste solvent was removed from the tank, and the tank was cleaned. The tank now stores virgin ethyl acetate.

Wastes Managed: The unit stored waste solvent (D001, F003, F005) until it was removed from the facility for disposal.

Release Controls:

The unit is located on a concrete base and is surrounded by a 3-foot-high berm.

**History of
Documented Releases:**

No releases from this unit have been documented.

Observations:

During the VSI, the unit appeared to be in sound condition and no evidence of release was noted.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the GPC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 Outdoor Solvent Recovery System

Conclusions: The Outdoor Solvent Recovery System is located in the west-central section of the facility. The unit is constructed of steel and rests on a concrete base. Also, GPC checks the structural integrity of the unit daily. No releases from this unit have been documented. Because of the unit has sound containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 2 Indoor Solvent Recovery System

Conclusions: The Indoor Solvent Recovery System is located in the western portion of the manufacturing building. The parts washer and still are constructed of steel and rest on sealed concrete. The holding tank has a concrete base and is surrounded by a concrete berm. No releases from this unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 2 Waste Solvent Storage Tank

Conclusions: The Waste Solvent Storage Tank is located aboveground and outdoors in the central section of the facility. The tank is constructed of steel, has a

RELEASED
DATE 3/2/99
RIN # 639/99
INITIALS mv

ENFORCEMENT
CONFIDENTIAL

sealed concrete base, and is surrounded by a 2-foot-high berm. No releases from the unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 4 Hazardous Waste Storage Area

Conclusions: The Hazardous Waste Storage Area is located outdoors in the west-central section of the facility. In this area, waste is stored in closed 55-gallon drums on a sealed concrete pad measuring 30 feet by 50 feet. The unit is surrounded by a 1-foot-high concrete berm. No releases from this unit have been documented. Because the unit has adequate containment, the potential for release to ground water, surface water, air, and on-site soils is low.

Recommendations: PRC recommends no further action for this unit.

SWMU 5 Former Waste Solvent Storage Tank

Conclusions: The Former Waste Solvent Tank is located outdoors in the west-central section of the facility. The tank stored waste solvent until the early 1980s and now stores virgin ethyl acetate. The tank is located on a sealed concrete base and is surrounded by a 3-foot-high concrete berm. No releases from this unit have been documented. The potential for release to ground water, surface water, air, and on-site soils is low because the unit has adequate containment.

Recommendations: PRC recommends no further action for this unit.

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ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Outdoor Solvent Recovery System	1982 to present	None	No further action
2. Indoor Solvent Recovery System	1982 to present	None	No further action
3. Waste Solvent Storage Tank	1982 to present	None	No further action
4. Hazardous Waste Storage Area	1980 to present	None	No further action
5. Former Waste Solvent Tank	Mid-1970s to early 1980s	None	No further action

REFERENCES

- Ausich, 1981. The Regional Paleontology and Stratigraphy of Ohio, Wright State University, May.
- Colorpac, Incorporated (Colorpac), 1980a. Notification of Hazardous Waste Activity form for the Colorpac Facility, August 14.
- Colorpac, 1980b. Part A Permit Application Filed with EPA, October 21.
- Colorpac, 1985. Letter to EPA Stating That All Hazardous Waste had been Removed Off Site, January 10.
- Graphic Packaging Corporation (GPC), 1988. Letter to EPA Listing Corrections to Violations Found During August 1988 Inspection of Facility, September 6.
- GPC, 1992. Ownership Information Provided by GPC During VSI, December 10.
- National Flood Insurance Program, 1987. Flood Plain Information for the GPC Area.
- Ohio Department of Natural Resources (ODNR), 1992. Well Log Packet for Area Near the GPC Facility.
- Ohio Environmental Protection Agency (OEPA), 1982. Letter to Colorpac Regarding Facility's Request for Change in Status, June 22.
- OEPA, 1988. Letter to GPC Regarding August 16, 1988, Inspection of the Facility, August 22.
- OEPA, 1989a. Letter to GPC Regarding May 1989 Inspection of the Facility, May 30.
- OEPA, 1989b. Letter to GPC Acknowledging Sufficient Corrections to Violations Found During May 1989 Inspection of Facility, August 8.
- PRC Environmental Management, Inc. (PRC), 1991. Telephone Conversation Between Peter Zelinskas, PRC, and S. Lewis, City of Franklin Water Maintenance, February 20.
- PRC, 1993. Telephone Conversation Between Kate Reising, PRC, and B. Simpson, City of Franklin Public Works Department, February 9.
- Todd, D.K., 1983. Ground Water Resources of the United States, Premier Press, Berkeley, California.
- U.S. Department of Agriculture (USDA), 1973. Soil Survey of Warren County, Ohio, March.
- U.S. Department of Commerce (USDC), 1961. Rainfall Frequency Atlas, May.
- U.S. Environmental Protection Agency (USEPA), 1981. Letter to Colorpac Regarding Incomplete Part A Permit Application, October 16.
- USEPA, 1982. Acknowledgement of Colorpac's Complete Part A Permit Application, May 27.
- USEPA, 1984. Letter to Colorpac Regarding Closure Requirements for the Facility, November 28.
- USEPA, 1985. Notification of Change in Regulatory Status for Colorpac, March 13.

U.S. Geological Survey (USGS), 1981. 7.5 Minute Quadrangle Topographic Map, Franklin, Ohio.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH	02 SITE NUMBER OHD 058 394 313
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II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Graphic Packaging Corporation		02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 708 South Avenue			
03 CITY Franklin	04 STATE OH	05 ZIP CODE 45005	06 COUNTY Warren	07 COUNTY CODE 165	08 CONG DIST
09 COORDINATES: LATITUDE 39°33'50"N		LONGITUDE 85°18'55"W			
10 DIRECTIONS TO SITE (Starting from nearest public road) Travel North on Main Street. Turn left onto new bridge. Travel northwest on Park Avenue. Turn left onto Cedar Street. Then turn right onto South Avenue; Graphic Packaging is on the left.					

III. RESPONSIBLE PARTIES

01 OWNER (if known) ACX Technologies, Inc.		02 STREET (Business, mailing residential) 1600 Table Mountain Parkway			
03 CITY Golden	04 STATE CO	05 ZIP CODE 80401	06 TELEPHONE NUMBER		
07 OPERATOR (If known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY	10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER		
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency Name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER _____ (Specify) <input type="checkbox"/> G. UNKNOWN					
14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply) <input checked="" type="checkbox"/> A. RCRA 3010 DATE RECEIVED: 10/21/80 <input type="checkbox"/> B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ <input type="checkbox"/> C. NONE MONTH DAY YEAR MONTH DAY YEAR					

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 12/10/92 <input type="checkbox"/> NO BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): PRC Environmental Management, Inc. (PRC)		02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1962 present UNKNOWN BEGINNING YEAR ENDING YEAR	
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED The Graphic Packaging facility generates off-specification printing ink (D001, F003, F005), solvent still bottoms (D001, F003, F005), still bottom ink sludge (D001, F003, F005), nonhazardous waste cleaning solution, and wastewater.					
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION The facility poses a low potential hazard to the environment or population.					

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input type="checkbox"/> C. LOW (Inspect on time-available basis) <input type="checkbox"/> D. NONE (No further action needed; complete current disposition form)			
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VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard		02 OF (Agency/Organization) U.S. EPA		03 TELEPHONE NUMBER (312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT Pete Zelinskas		05 AGENCY	06 ORGANIZATION PRC	07 TELEPHONE NUMBER (513) 241 - 0149	08 DATE 02/07/93 MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

**Graphic Packaging Corporation
708 South Avenue
Franklin, Ohio 45005
OHD 058 394 313**

Date: December 10, 1992

Primary Facility Representative: Ron Kline
Representative Telephone No.: (513) 746-4511
Additional Facility Representatives: Russell DeVilbiss
Wayne Wilson

Inspection Team: Pete Zelinskas (PRC)
Kate Reising (PRC)

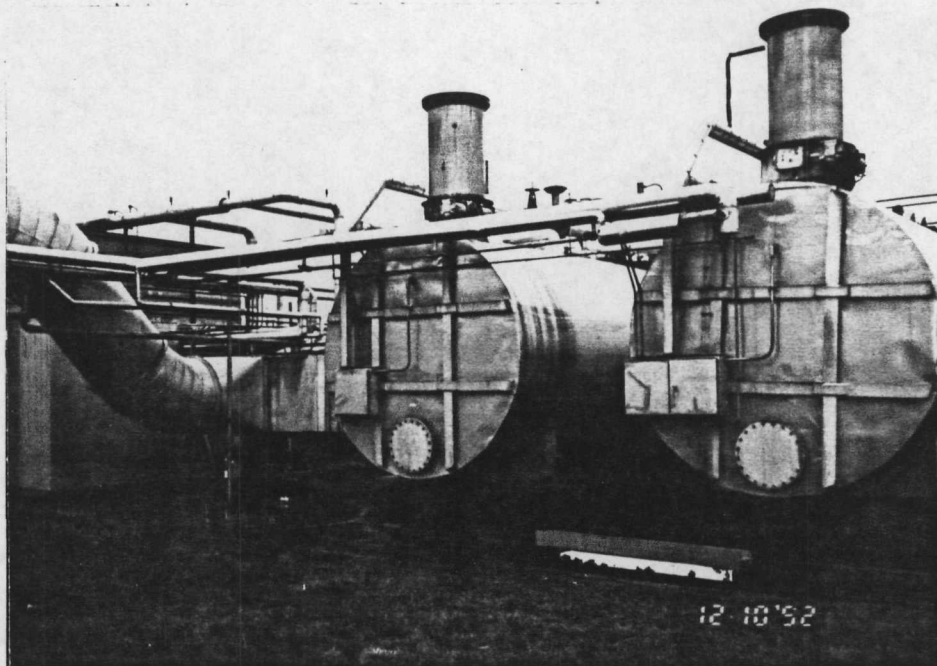
Photographer: Kate Reising

Weather Conditions: Raining, 45°F

Summary of Activities: The visual site inspection (VSI) began at 1:30 p.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 2:45 p.m. and involved a walk-through of the facility. PRC observed the entire facility, including the Outdoor Solvent Recovery System (SWMU1), the Indoor Solvent Recovery System (SWMU 2), the Waste Solvent Storage Tank (SWMU 3), the Hazardous Waste Storage Area (SWMU 4), and the Former Waste Solvent Tank (SWMU 5). PRC examined the concrete throughout the facility for cracks and stains. PRC noted that it was structurally sound and free of stains.

The tour concluded at 3:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 4:00 p.m.



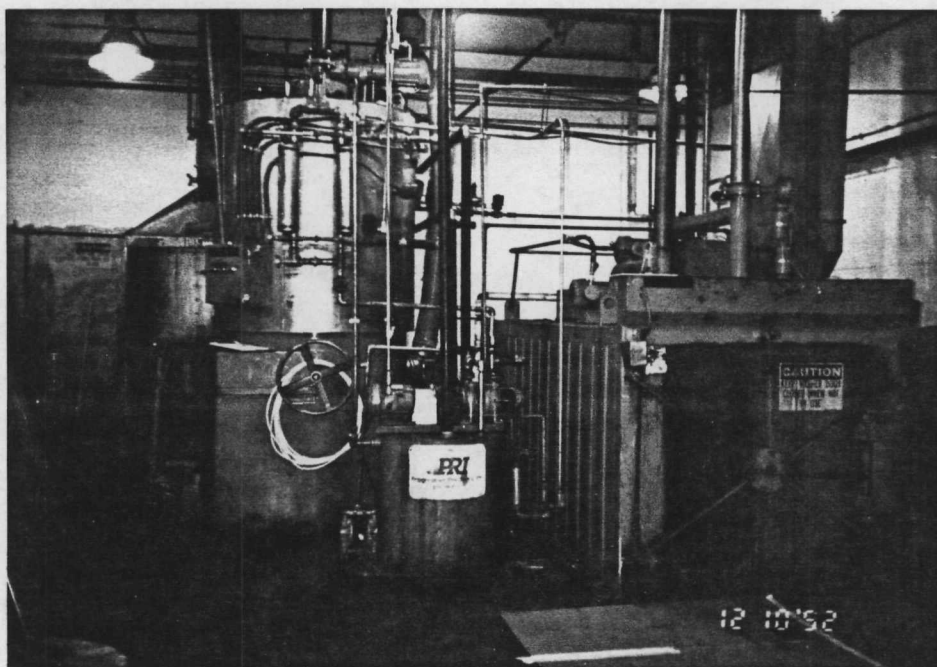
Photograph No. 1

Orientation: South

Description: Outdoor Solvent Recovery System; tanks containing charcoal beds.

Location: SWMU 1

Date: 12/10/92



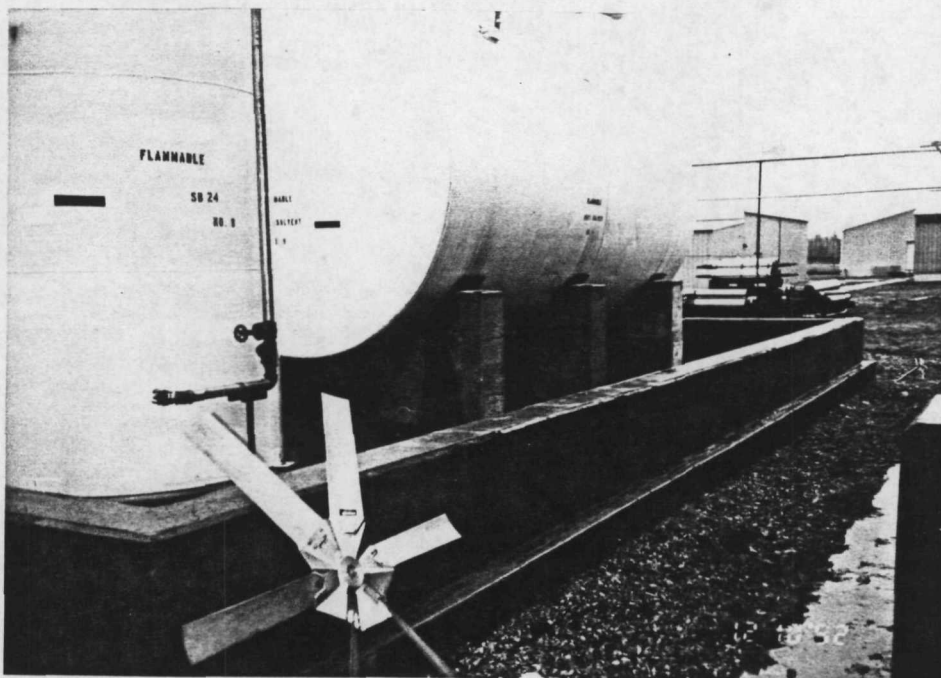
Photograph No. 2

Orientation: South

Description: Indoor Solvent Recovery System.

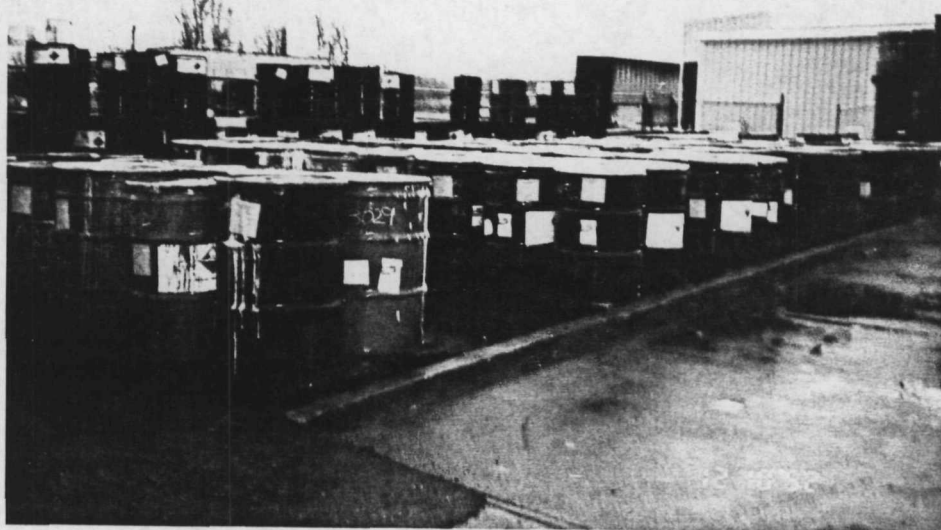
Location: SWMU 2

Date: 12/10/92



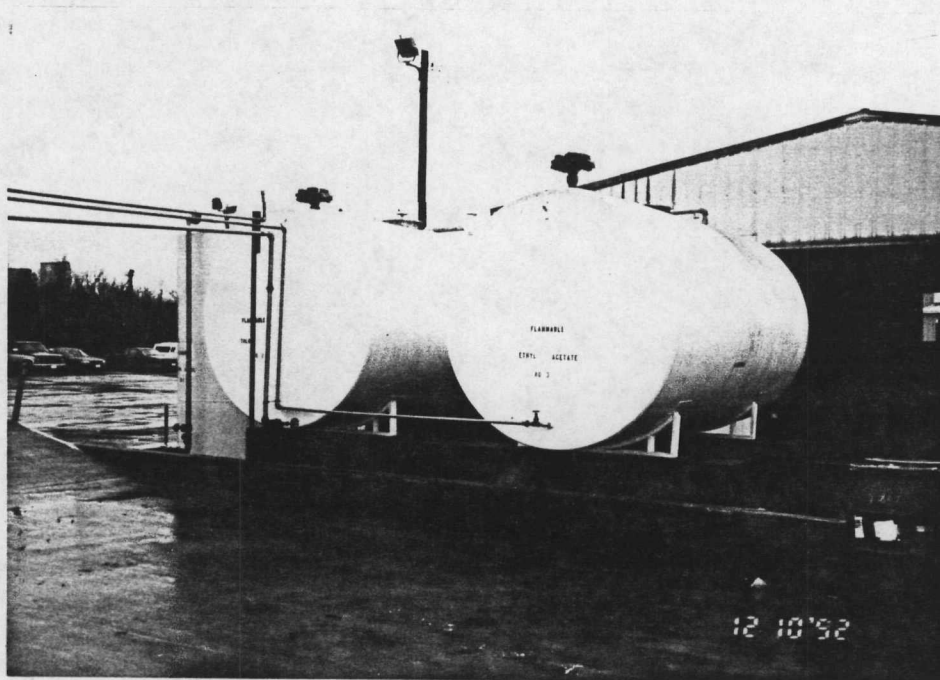
Photograph No. 3
 Orientation: South
 Description: The Waste Solvent Storage Tank.

Location: SWMU 3
 Date: 12/10/92



Photograph No. 4
 Orientation: Southeast
 Description: Hazardous Waste Storage Area.

Location: SWMU 3
 Date: 12/10/92



Photograph No. 5
Orientation: Southwest
Description: Former Waste Solvent Tank.

Location: SWMU 4
Date: 12/10/92

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

1872

12-10-92

19

VSE w/ Graphic Packaging
Franklin, Ohio

Side contract - Ron Kline

MIC: Side Zeliastis

Kube Printing - Photos

Conditions: Dry, cool

& 45°F. Graphic Packaging
is a labeling company
in an industrial/residential
part of Franklin.

1330

Equipment - Dene

Robo gravure printing

Flexographic printing

Lamination

Laminated extruding

Solvent and

& Solvent recovery system

Let R. Zeliastis 12-10-92

20

water wells - Franklin
Graphic Packaging giving
us a lot of handouts
Sampling wastewater
Derris to City of Franklin.

* Create flexible packaging
Jesp wrapped currently the
main product here.

* waste int, usually reuse
int. Distillation here
Reclaimed energy Corp
Connellsville Ind.

* Reclamation/Fuels blending
to a concrete plant.

* Safety-Kleen no longer.

* Totally fenced, fire system
3 shifts, 120 employees

* No permits - ~32 hot ints
+ solvents.

L.H. Schmitz 12-10-90

21

* Wastewater - metals, pH
flow, No oils, Quarterly.

* Oils and hydraulic fluids
go out with still bottoms
and solvents.
No MSDS.

→ Tank pits

Cooling water to pond
percolates into ground
Building above ground
tanks. ~1980. Both
small condensers are
ground tanks.

No industrial wells.

1445 Site work around
Inlet solvent recovery
system throughout.

Still. Clean solvent
being generated.

L.H. Schmitz 12-10-90

22

Solvents pumped directly
to still. Solvents pumped
to washer.

Stormwater to ground water.

* Haz waste site area.

Beamed. = 30 & 50 1980

4" beam. Not covered.

A few small marks.

~ 80 drums on-site

Showing mixing area
to rear of plant.

* Boiler blowdown cooling
tower water, stormwater.

* Pond

* Solvent Recovery System,
VOCs into system 1982

→ Filter (paper) →

Charcoal tanks 10' x 40'

air through charcoal

Let's go. 12-10-80

23

Have to add charcoal

Net removal ~ 400 gal/day

Under solvent mixture

Charcoal removal occasionally
water 90% reclaim.

* Dirty solvent tank

To distiller 12,000 gal

Stormwater sampled

1988

* Waste Tank at one time

Pre 1980 on both

Used for waste solvent

at one time. Former Sulfur

Late 1980s New

Ethyl Acetate = 5,000 gal

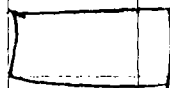
* Completed site

walk around.

Let's go. 12-10-80

24
Union
Camp

Farms



South St.

Brush (Residences)

1650 DRC exiting side after
closing meetings

[Handwritten signature]

12-10-66

25